

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>IN THE MATTER OF THE</b>	)	<b>Case No. 1:17-CV-02116-DAP</b>
<b>COMPLAINT OF GREAT LAKES</b>	)	
<b>AND INTERNATIONAL TOWING &amp;</b>	)	
<b>SALVAGE COMPANY INC. AND ST.</b>	)	<b>JUDGE DAN AARON POLSTER</b>
<b>MARYS CEMENT INC. (CANADA)</b>	)	
<b>FOR EXONERATION FROM OR</b>	)	
<b>LIMITATION OF LIABILITY</b>	)	
	)	
	)	

**UNOPPOSED MOTION FOR RELEASE OF LETTER OF UNDERTAKING**

Defendants Great Lakes and International Towing & Salvage Company Inc. and St. Marys Cement Inc. (Canada) (“Defendants”) hereby move the Court for entry of an Order discharging, releasing and exonerating The North of England P&I Association Limited of the Letter of Undertaking executed on September 29, 2017 (the “Letter of Undertaking”) and filed with this Court in support of Defendants Petition for Exoneration from or Limitation of Liability. (Doc. No. 1, 10/6/17)

The Letter of Undertaking should be terminated and released because the parties have reached a settlement agreement in this matter and the parties have stipulated to a voluntary dismissal of this case.

Counsel for claimants Andrea Burton, Individually and as Executrix of the Estate of Roger Burton, and Michael Jarvis were contacted on June 18, 2018 and do not oppose this Motion.

WHEREFORE, for the foregoing reasons, Defendants move this Court for entry of an Order fully and unconditionally discharging, releasing and exonerating the Letter of Undertaking

and releasing The North of England P&I Association Limited from any and all past, present and future liability in connection with the issuance of the Letter of Undertaking.

Respectfully submitted,

/s/ Eric S. Daniel

Eric S. Daniel (0078218)

Robert W. Burger (0068539)

Harold W. Henderson (0019056)

**THOMPSON HINE LLP**

3900 Key Center

127 Public Square

Cleveland, Ohio 44114-1291

216-566-5500 (Phone)

216-566-5800 (Fax)

Eric.Daniel@ThompsonHine.com

Rob.Burger@ThompsonHine.com

Hal.Henderson@ThompsonHine.com

*Attorneys for Defendants Great Lakes and  
International Towing & Salvage Company  
Inc. and St. Marys Cement Inc. (Canada)*

**IT IS SO ORDERED:**

June 21, 2018

**Date**



**U.S. District Judge Dan Aaron Polster**